

September 9, 1998

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical and it is presented here exactly as submitted.

FMC Corporation

Agricultural Chemical Group
1735 Market Street
Philadelphia Pennsylvania 19103
215 299 6000

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FMC

July 26, 1995

Facsimile (703)308-8773

Mr. Lawrence J. Schnaubelt
Section Head
Reregistration Branch, Section II
Special Review and Reregistration Division H7508W

Document Processing Desk
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

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Dear Mr. Schnaubelt:

Subject: Reregistration Case Number/Name: 0090 - Ethion
Chemical Number/Name: 058401 - Ethion
Registrant Number 279

Risk Mitigation Proposals - Ethion Use on Citrus

As has been discussed this morning with Mr. Robert Richards, Chemical Review Manager, FMC Corporation is preparing risk mitigation proposals to address issues raised by the EPA in regards to the use of Ethion 4 Miscible (EPA Reg. No. 279-1254) on citrus. At the request of Mr. Richards, we are providing you with the following outline of the key proposals which will be included in the submission currently under preparation by FMC.

1. Analysis of Exposure Including Mixer/Loaders, Applicators, and Re-entry Tasks.

EPA has proposed the use of the 21-day dermal rabbit study to use in risk assessments where dermal exposure is the route of concern. FMC, though, continues to support the use of two human studies (dermal and oral) in addition to information from a rat metabolism study (data used in order to adjust for absorption when using the oral data in comparison to the dermal data) for use in the risk assessments. EPA has recommended a re-entry interval of 21 days for workers whereas FMC will be proposing an REI of one day. Please note that the rat metabolism study being referenced has not been submitted to the Agency, but will be included as an attachment in our formal response to SRRD and concurrently submitted to the Registration Division for full review.

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2. Rate, Number of Applications, and Spray Interval.

EPA has suggested reduction in rate to 1 lb. ai/A and to extend the spray interval to two times the field dissipation half-lives which would equal 136-166 days.

FMC must maintain a minimum of 2.5 lbs. ai/A per application (current label rate is 2.5 - 3.0 lbs. ai/A) and maintain a spray interval of 90 days. Rather than a maximum of three applications allowed per year as recommended on our current label (maximum total of 9.0 lbs. ai/A), we will suggest two applications per year at a maximum total of 5.0 lbs. ai/A/year.

3. Application Methods.

FMC is willing to prohibit aerial applications. In addition, for airblast applications, we will support the restrictions as suggested (airblast outside three rows from outside the grove with nozzles of sprayer on grove side only; nozzles facing away from grove should be turned off; shut off spray when turning at end of rows and when passing gaps in tree rows; direct sprays away from bodies of water).

Through studies conducted by the Spray Drift Task Force, FMC will propose a 100' buffer from bodies of water. EEC calculations will be provided to support this proposal.

If necessary, I would be available to meet with you to discuss our proposals in more detail. If a technical meeting such as that which occurred with EPA on January 25, 1995 is more appropriate, please let me know as soon as possible so that we can begin to coordinate everyone's schedule.

Please call if there are any questions.

Sincerely,



Nancy J. Hilton
Product Development and Registrations Manager
(215) 299-6753

cc: Dave Simcox (FMC Corporation)
Robert Richards (EPA/SRRD)

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